

**United States District Court
District of Massachusetts**

United States)	
)	
v.)	
)	No. 04-CR-10214-GAO
Mohamed Hamade,)	
Defendant.)	
)	

Assented-to Motion to Continue Sentencing

Defendant Mohamed Hamade moves that this Honorable Court continue the date for sentencing from August 1, 2007, to September 7, 2007.

In support of this motion, the defendant states as follows:

1. On May 15, 2007, Hamade pled guilty pursuant to a plea agreement with the government under Federal Rule of Evidence 11(c)(1)(C). As part of the agreement, Hamade agreed to a stipulated order of deportation, which the Court issued on the same date.

2. The Court has scheduled a sentencing hearing for August 1, 2007.

3. Hamade, his counsel, and the government have been making arrangements for Hamade's prompt deportation after sentencing. There are details, however, that have not yet been worked out and will not be worked out by the current sentencing date of August 1, 2007. The continuance requested in this motion should permit Hamade and his counsel to work out those

details, allowing for Hamade's prompt and smooth removal from the United States after sentencing.

4. Assistant United State Attorney Alope Chakravarty has assented to this motion on behalf of the government.

For these reasons, the defendant requests that the Court continue the date for sentencing to September 7, 2007.

Mohamed Hamade
By his attorneys,

/s/ John Salsberg
John Salsberg
B.B.O. No. 439300

/s/ Ryan M. Schiff
Ryan M. Schiff
B.B.O. No. 658852

SALSBERG & SCHNEIDER
95 Commercial Wharf
Boston, MA 02110
(617) 227-7788

Dated: July 18, 2007

Certificate of Service

I hereby certify that I have served this motion on the government and all counsel of record by e-filing.

/s/ Ryan M. Schiff
Ryan M. Schiff